

# SCHEIFF HARDIN & WAITE

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340185

Chicago  
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January 26, 1994

Ms. Sherry L. Estes  
Office of Regional Counsel  
Solid Waste & Emergency  
Response Branch Section 4  
U.S. EPA  
77 W. Jackson Blvd., CS-3T  
Chicago, IL 60604

**Re: Stickney and Tyler Landfills, Toledo, Ohio**

Dear Sherry:

On January 6, U.S. EPA hosted an informational meeting at Region 5's offices for parties receiving general notice letters for the Stickney Avenue Landfill and Tyler Street Dump. At that meeting, counsel for Chrysler realized that U.S. EPA mistakenly believed that Chrysler and its predecessor Jeep were related in some way to a company called Electric Autolite. Electric Autolite owned the Stickney Avenue property at the time the site was operated as a municipal landfill by the City of Toledo. Chrysler is not the successor to Electric Autolite, and, by this letter, Chrysler is providing the best information it has been able to obtain concerning the successor to Electric Autolite.

Briefly, Chrysler believes the succession of companies to be as follows. Electric Autolite merged with another company and changed its name to Eltra Corp. in 1963. Eltra Corp. was acquired by Allied-Signal in 1980. Allied-Signal apparently renamed Eltra and divided it into operating divisions called Prestolite. Allied-Signal then divested some portions of Prestolite, selling two divisions to Prestolite management in 1986.

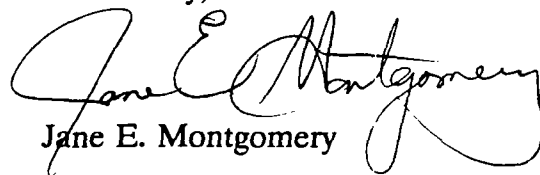
The documentation available from computer databases does not provide enough information to show which company succeeded to the liabilities of Electric Autolite, the owner of the Stickney Avenue Landfill when waste was disposed at the site. However, it appears to us that Allied-Signal probably kept the Autolite portion of Eltra since it still uses the trade name "Autolite" for its line of spark plugs. The current company known as Prestolite has gone through a bankruptcy and, while Prestolite still is in business, Chrysler does not know the terms of its bankruptcy reorganization. All of the missing information could presumably be gathered by U.S. EPA through a specific information request or could be developed in more detail after notice letters are issued.

Ms. Sherry L. Estes  
U.S. EPA  
January 26, 1994  
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Incidentally, the enclosed documentation shows that Allied-Signal is the successor to Allied Chemical, one of the companies shown as a generator on your January 18, 1994, Summary of Witness Information. Additionally, the second paragraph of your January 18 summary may indicate a connection between Textile Leather and Willys Overland/Jeep. While Willys Overland was a predecessor of Kaiser Jeep Corp., neither of those companies is related in any way to Textile Leather, a company Chrysler believes is related to GenCorp.

If you have any questions regarding this information, please do not hesitate to call me.

Yours truly,



Jane E. Montgomery

JEM:rnk  
Enclosure

cc: Lynn Y. Buhl  
Sheldon A. Zabel  
Eric L. Lohrenz

FEB 4 1994 REC'D

1) Chrysler's information attempting to tie in Allied Signal as an owner of Stickney.

3) Info fr Matlack, Inc., statutory  
(We didn't do it. "

1) I will personalize the 104(c) to Allied Signal, as it appears they are key here. Can you please copy me on the Dura interrogatories to Allied (as they exist in the records center) - I will take info fr these questions in my "personalized" response.

2) See Montgomery's last exhibit. It appears that she can search the Duns-  
Corporate service for all states in looking

for corporate info. Also, consider  
probing as a possible source of  
corporate / successor info & possibly  
a quicker source than 10(K) info.  
3) on the DL but for successors, OIG's no  
indirect majority of jurisdictions  
(Young) no always -